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TRULINCS 05409089 - DYER, TODD A - Unit: LVN-F-F

FROM: 05409089
TO: Blumling, Ryan; Dyer, Todd; Krumdick, Father Mel
SUBJECT: Motion Requesting Bank Communications
DATE: 04/10/2022 09:21:16 PM

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FILED

2022 APR 15 P 3:06

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

TODD A. DYER,
Defendant,

Case No: 19-CV-1319-PP Temporary Restraining Order

MOTION REQUESTING PREVIOUSLY REFERENCED BANK COMMUNICATIONS

NOW COMES, Defendant, Todd A. Dyer, pro se, with his Motion Requesting Previously Referenced Bank Communications and offers in support the following;

Background

On March 29, 2022 Dyer received notice that Assistant United States Attorney ("AUSA") Emily Constantine had withdrawn as counsel for the Government in the above captioned case. (Dkt. Nos. 104 and 105)

Dyer is still awaiting for a response from the Government regarding AUSAs Constantine and Frohling's claims.

On February 22, 2022 the Government filed a Notice of Violation of Temporary Restraining Order wherein AUSAs Constantine and Frohling allege that an employee of Town Bank whose initials were "J.S." determined that checks and wires made payable to the Agri Business Investors Limited Partnership (Tax ID.#46-1102123) ("ABILP") that were endorsed and deposited into a Community Bank CBD account (account no. 4100808) in the name of Agri Business Investors General Partnership (Tax ID.#27-3429124) ("ABIGP") by Mark Borst were not fraudulent or criminal in nature.

It was alleged further by AUSAs Constantine and Frohling that, someone from Town Bank's legal department also determined the transactions, as described above, were not fraudulent or illegal.

Argument

If "J.S." (AKA John Smith) Town Bank vice president of business banking, and the Town Bank legal department never made such a determination, and AUSAs Constantine and Frohling's were overreaching and/or were being untruthful, Dyer has a right to know these things as they are relevant to the forthcoming TRO hearing.

As the Court is well aware, we alleged in the Walworth County lawsuit that, Borst took proceeds from the sale of stock warrants issued by American Farmland Partners Corporation ("AFPC") ABILP and placed them into the similarly names ABIGP account that he, and he alone controlled.

It is noteworthy that, the Government's own affidavit for search of June 2012 verifies the fact that Borst controlled the account.

Continuing, we allege Borst also took the remaining AFPC, stock and stock warrants, and American Farmland Limited Partnership ("AFLP") interests, and exchanged those securities for securities in "buffer" entities, in transactions concealed from Father Melvin E. Krumdick ("Father Mel") and Todd Dyer ("Dyer"), ultimately ending up with securities issued by publicly-traded Farmland Partners, Inc. (FPI: NYSE) which Borst sold following the company's initial public offering in 2014 for a literal windfall.

It bears mentioning again that, we allege this is part of a larger Racketeering Influenced and Corrupt Organizations (RICO) Act scheme wherein Dyer's business model was stolen or otherwise transferred illegally, a scheme in which members of the

Milwaukee US Attorney Office are knowing conspirators, including Ms. Constantine.

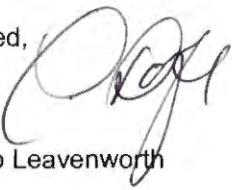
If there is an email, letter or verbal determination from any Town Bank officer and/or the bank's legal department, in the possession of the the US Attorney Office wherein, these individuals state the Community Bank CBD account transactions in question were not fraudulent or illegal, Dyer is entitled to them.

Relief Sought

Dyer requests copies of any and all emails, letters and/or memorandum of interviews between AUSAs Constantine, Frohling and the Town Bank, vice president of business banking, John Smith, and members of Town Bank's legal department which support the Government's prior claims.

Respectfully submitted,

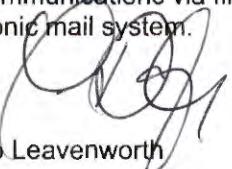
Todd Dyer
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Federal Prison Camp Leavenworth
P.O. Box 1000
Leavenworth, KS 66048



Certificate of Service

I, Todd A. Dyer, hereby certify under penalty of perjury that I did, on April 11, 2022, mail this Motion Requesting Previously Referenced Bank Communications via first class US mail to the clerk of court and request it be shared with all relevant parties via the court's electronic mail system.

Todd A. Dyer
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Clerk Of Circuit Court

517 E Wisconsin AVE

Milwaukee, WI 53202

United States

KEN K. MATTHEW
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